

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

**LOLITA PENNINGTON, INDIVIDUALLY
AND AS REPRESENTATIVE OF THE
ESTATE AND WRONGFUL DEATH
BENEFICIARIES OF ANDRIANA HALL,**

Plaintiffs,

v.

No. 3:16-cv-248-NBB-JMV

**SHARANJIT PARMAR,
PARMAR TRUCKLINES,
UPS GROUND FREIGHT INC.
A/K/A UNITED PARCEL SERVICE,**

Defendants.

AFFIDAVIT OF RALPH D. SCOTT, JR.

Ralph D. Scott, Jr., being first duly sworn, states:

1. My name is Ralph D. Scott, Jr., Ph.D. I reside in Conway, Arkansas. I am an adult, competent to testify, and have personal knowledge of the facts recited in this affidavit.
2. I am a Professor of Economics at Hendrix College. I have been retained by Plaintiffs' counsel in the case of Lolita Pennington, et al. v. Sharanjit Parmar, et al. as an expert witness on economic damages arising from the April 14, 2016 accident involving Andriana Hall.
3. A true and correct copy of my original expert report dated November 13, 2017 is attached as Exhibit A hereto.
4. In my expert report, I based my assumptions on the lost earning capacity of Andriana Hall upon the average earnings of similarly situated individuals at similar levels of educational attainment because at the time of her death she was a 20 year old college student

EXHIBIT

with a very limited earnings history from a part time job.

5. In the field of forensic economics, it is a generally accepted methodology to use statistical data addressing the average earnings of similarly situated individuals at similar levels of educational attainment as the basis for lost earning capacity of a minor or young adult whose employment history is not indicative of their earning capacity based on past or continuing educational attainment.

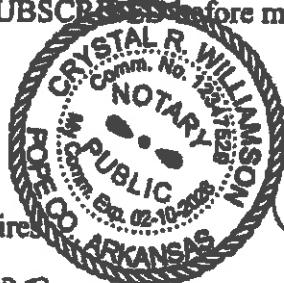
6. In a previous case, I was retained as an expert witness by the law firm of Glassman, Wyatt, Tuttle & Cox, P.C., who represents UPS Ground Freight, Inc. in this matter. A true and correct copy of my expert report dated November 7, 2016 for Lauran Stimac of that firm is attached as Exhibit B hereto.

7. The methodology that I used to compute lost earning capacity in the expert report for Ms. Stimac is identical or very similar to the methodology that I used in the present case.

FURTHER AFFIANT SAYETH NOT.

Ralph D. Scott, Jr.
Ralph D. Scott, Jr.

SWORN TO AND SUBSCRIBED before me this the 15th day of February, 2018.



My Commission Expires

02-10-2024

Cynthia R. Williamson
NOTARY